

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STEVEN RAMSEY

Plaintiff,

v.

JAY CASHMAN, INC.

Defendant

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CIVIL ACTION

NO. 04-CV-10699(RCL)

VERDICT FORM

1. Do you find that the plaintiff has established by a preponderance of the evidence the elements of his claim of negligence under the Jones Act, which played any part, no matter how slight, in bringing about an injury to plaintiff? (Answer yes or no.) _____

2. Do you find that the plaintiff has established by a preponderance of the evidence his claim that an unseaworthy condition of the ship, its equipment or crew played a substantial part in causing an injury to plaintiff? (Answer yes or no.) _____

If you have answered "no" to questions 1 and 2, you should proceed no further and report a verdict for the defendant. If you have answered "yes" to question 1 or 2, then continue and answer the following.

3. If you find that the plaintiff is entitled to recover, do you find that the defendant has established its claim that plaintiff was himself negligent and that such negligence played a substantial part in bringing about his injury? (Answer yes or no.) _____

If your answer to question 3 is no, go to question 5. If your answer to question 3 is yes, answer question 4.

4. If your answer to question 3 is yes, to what extent, stated in percentage, did plaintiff's negligence contribute to bringing about his injury?_____

5. Do you find that the plaintiff is entitled to recover damages for:

a. Loss of earnings? (Answer yes or no.)_____

b. If your answer is yes, in what amount?\$ _____

(I remind you that, if plaintiff is entitled to an award for (future) lost wages, you are to determine an amount for each (future) year and then you should discount each annual installment to present value.)

c. Pain and suffering from the date of the accident to date, taking into account the nature and extent of the injuries? (Answer yes or no.)_____

d. If your answer is yes, in what amount?\$ _____

e. Future pain and suffering? (Answer yes or no.)_____

f. If your answer is yes, in what amount?\$ _____

g. Out-of-pocket expenses (medical bills, etc.)? (Answer yes or no.) _____

h. If your answer is yes, in what amount? \$ _____

i. What is the total amount of damages? \$ _____